UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

OCT 07 2016

CERTIFIED MAIL 7009 1680 0000 7642 3205
RETURN RECEIPT REQUESTED

REPLY TO THE ATTENTION OF

Mr. Geoff R. Bertin
Plant Manager
ERCO Worldwide (USA), Incorporated – Port Edwards Plant
101 State Highway 73 South
Nekoosa, Wisconsin 54457

Re: Notice of Violation
Compliance Evaluation Inspection
WID046536231

Dear Mr. Bertin:

On July 14, 2016, a representative of the U.S. Environmental Protection Agency inspected the ERCO Worldwide (USA), Incorporated – Port Edwards Plant (ERCO), facility located in Nekoosa, Wisconsin. As a large quantity generator of hazardous waste, ERCO is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq*. (RCRA). The purpose of the inspection was to evaluate ERCO's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by ERCO, EPA's review of records pertaining to ERCO, and the inspector's observations, EPA has determined that ERCO has unlawfully stored hazardous waste without a license or interim status as a result of ERCO's violation of certain requirements for a license exemption under Wis. Admin. Code § NR 662.034(1)-(3). EPA has identified the license exemption requirement(s) violated by ERCO as of the date of the inspection in paragraphs # 1 and 2, below.

STORAGE OF HAZARDOUS WASTE WITHOUT A LICENSE OR INTERIM STATUS

At the time of the inspection, ERCO violated the following large quantity generator license exemption requirements:

1. RCRA Training Documents and Records

Under Wis. Admin. Code §§ NR 662.034(1)(d) and 665.0016(4)(b) [40 C.F.R. §§ 262.34(a)(4) and 265.16(d)(2)], a large quantity generator must maintain all of the following documents and records at the facility: a written job description for each position listed under par. (a). This description may be consistent in its degree of specificity with descriptions for other similar positions in the same company location or

bargaining unit, but shall include the requisite skill, education or other qualifications, and duties of facility personnel assigned to each position.

During the inspection of records, there was no documentation of training record requirements provided that included the following: job descriptions for each job title/position related to hazardous waste management.

2. Contingency Plan Content

Under Wis. Admin. Code §§ NR 662.034(1)(d) and 665.0052(4) [40 C.F.R. §§ 262.34(a)(4) and 265.52(d)], a large quantity generator must ensure that plan shall list names, addresses and phone numbers (office and home) of all persons qualified to act as emergency coordinator (see s. NR 665.0055), and this list shall be kept up to date. Where more than one person is listed, one shall be named as primary emergency coordinator and others shall be listed in the order in which they will assume responsibility as alternates.

Also, under Wis. Admin. Code §§ NR 662.034(1)(d) and 665.0052(5) [40 C.F.R. §§ 262.34(a)(4) and 265.52(e)], a large quantity generator must ensure the plan shall include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external) and decontamination equipment), where this equipment is required. This list shall be kept up to date. In addition, the plan shall include the location and a physical description of each item on the list, and a brief outline of its capabilities.

During the inspection of records, the contingency plan did not include the following: home addresses listed in the plan for the designated emergency coordinators, and the location descriptions for the decontamination equipment (eye wash stations and safety showers).

Summary: By violating the requirements for a license exemption, above, ERCO became an operator of a hazardous waste storage facility, and was required to obtain a Wisconsin hazardous waste storage license. ERCO failed to apply for such a license. ERCO's failure to apply for and obtain a hazardous waste storage license violated the requirements of Wis. Admin. Code §§ NR 670.001(3), 670.010(1) and (4) [40 C.F.R. §§ 270.1(c), and 270.10(a) and (d)].

OTHER VIOLATIONS

3. Universal Waste Labeling

A small quantity handler of universal waste must ensure that each lamp or a container or package in which the lamps are contained must be labeled or marked clearly with the

phrase "Universal Waste—Lamps", "Waste Lamps" or "Used Lamps". See, WAC, NR § 673.14(5) [40 C.F.R. § 273.14(e)].

During the inspection of the Warehouse 90-Day and Universal Waste Storage Area, there was one 5-gallon container that contained spent lithium ion batteries as stated by Ms. Barteck. The container was labeled as "Lithium Ion Batteries Only", was dated 4/4/16, and was closed. Then Ms. Barteck added the labeling "Used - Universal Waste" to the container.

At this time, EPA is not requiring ERCO to apply for a Wisconsin hazardous waste operating license (for the areas identified above) so long as it immediately establishes compliance with the requirements for a license exemption outlined in paragraphs # 1 and 2, above.

During the inspection, as observed by EPA, and after the inspection, as documented in a July 19, 2016 email to EPA and a July 22, 2016 letter to EPA, you took certain actions to establish compliance with the above license exemption requirements and universal waste requirement. Based on the information received from ERCO on 7/19/16 and 7/22/16, EPA is not planning additional enforcement actions based on this inspection at this time. This letter does not limit the applicability of the requirements evaluated, or of other federal or state statutes or regulations. EPA appreciates ERCO's cooperation.

If you have any questions regarding this letter, please contact Mr. Gangwisch, of my staff, at (312) 886-0989 or at gangwisch.bryan@epa.gov.

Sincerely,

Gary J. Victorine, Chief
RCRA Branch

Enclosure

cc: Dan Cummins, ERCO, DCummins@ercoworldwide.com
Emily Fattore, ERCO, EFattore@ercoworldwide.com
Brenda Halminiak, WI DNR, brenda.halminiak@wisconsin.gov
Michael Ellenbecker, WI DNR, michael.ellenbecker@wisconsin.gov

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5, LCD, RCRA BRANCH, LR-8J
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME: ERCO Worldwide (USA), Incorporated – Port Edwards Plant

EPA ID No.: WID046536231

ADDRESS: 101 State Highway 73 South
Nekoosa, WI 54457

DATE OF INSPECTION: July 14, 2016

EPA INSPECTOR: Bryan Gangwisch

PREPARED BY: _____ 7/26/16
Bryan Gangwisch — Date Completed
Environmental Scientist
Compliance Section #2

APPROVED BY: _____ 7/28/16
Julie Morris, Chief — Date
Compliance Section #2

Purpose of Inspection
This inspection was an evaluation of ERCO Worldwide (USA), Incorporated – Port Edwards Plant (ERCO), and its compliance with hazardous waste regulations found at Wisconsin Administrative Code (WAC) and the Code of Federal Regulations (CFR). The inspection was a Federal lead RCRA Compliance Evaluation Inspection (CEI).

Participants

Dan Cummins, Environmental Manager	ERCO
Kristine Barteck, Engineering Technician	ERCO
Geoff R. Bertin, Plant Manager	ERCO
Dawn D. Jensen, Technical Manager	ERCO
Jim Bergeron, Manager Safety and Security	ERCO
Mark Schneider, Production Manager	ERCO
Bryan Gangwisch, Environmental Scientist	U.S. EPA

Introduction
I arrived at the site at approximately 10:02 a.m. The weather consisted of sunny conditions with a light wind, and an ambient air temperature of approximately 73 degrees Fahrenheit. I introduced myself, presented my inspector credentials, and described the purpose of the inspection and the process by which I intended to conduct the inspection. Mr. Cummins, Mr. Bertin, and Ms. Jensen provided me with a verbal description of the site, then Mr. Cummins and Ms. Barteck led the tour throughout the facility, and then attempted to provide me with the records I requested for review.

Site Description
ERCO was operating as a large quantity generator at the time of the inspection based upon hazardous waste generation rates throughout each year (still large quantity generation amounts generated a couple of months per year) and as stated by Mr. Bertin.

The following facility description and waste generation information was stated by Mr. Bertin, Mr. Cummins, and Ms. Jensen unless otherwise noted. The facility was constructed in the late 1960s. The facility has been owned and operated by ERCO since July 2005. ERCO performs chloralkali manufacturing and produces chlorine, potassium and sodium hydroxide, caustic pot ash/soda, and hydrochloric acid. As a result of the facility's operations, hydrogen and chlorine gas are produced as byproducts. There are approximately 98 total employees that work 24/7 for 365 days per year at the facility.

When ERCO purchased the facility in 2005, a mercury-based process was utilized in the chloralkali manufacturing process. In 2009, ERCO converted to a membrane cell electrolysis process and installed processes to support the membrane process, and no longer utilized mercury in the manufacturing process. ERCO also utilizes boilers and cooling towers.

The facility's manufactured liquid chlorine is sold in bulk (rail cars), the potassium and sodium hydroxide and the hydrochloric acid products are shipped either in tanker trucks or rail cars.

There were two hazardous waste storage areas located in the facility. There were approximately four satellite accumulation areas (SAA) located throughout the facility. The containers that are used to manage hazardous waste at ERCO consist of 55-gallon drums or smaller containers. There were no hazardous waste tanks at the facility. There were no ponds on the facility property.

Prior to 2009 (mercury process), and the process conversion to the membrane cell, there had been a former hazardous waste tank treatment system located at the facility. The following information is documented in RCRAInfo: On February 7, 2011, the Wisconsin Department of Natural Resources (WDNR) received notification of the intent to close the hazardous waste container and tank treatment units for K071 hazardous wastes for the facility. On July 21, 2011, WDNR received ERCO's letter dated July 19, 2011, which requested a plan modification to the facility's closure plan in order to decontaminate equipment in place and then reuse the equipment in the manufacturing process instead of disposing of the equipment. WDNR conditionally approved the plan modification request from ERCO to decontaminate equipment in place. On November 23, 2011, WDNR received the Facility Closure Certification Report entitled "Closure Report – K071 N-Brine Muds Treatment System" for the facility. In response to the Facility Closure Certification Report, WDNR performed a closure inspection on December 14, 2011. WDNR verified that all containers, tanks, structures and wastes affiliated with the container and tank treatment system were either cleaned or removed from the site. The closure inspection verified that ERCO was now operating as a large quantity generator (no longer a TSDF). The information provided by ERCO and the closure inspection verifies that the facility closed in substantial conformance with the facility's approved closure plan and conditions of the operating license.

ERCO is approximately seventeen years into their thirty-year post closure and ground water long term monitoring/long term care compliance monitoring program.

ERCO does have a WPDES permit to discharge treated waste water to the Wisconsin River. There have been no incidents and no contingency plan implementation for any events related to hazardous waste.

The main waste streams generated at ERCO consist of: mercury contaminated waste and mercury contaminated debris (still removing old structures/areas based upon preventative maintenance), waste water treatment sludge (cleaning projects/maintenance), paint related waste, and brine muds. The hazardous waste codes associated with the main waste types that are

generated at ERCO consist of: D001, D002, D035, F003, and F005. The facility's generated spent universal waste lamps, batteries and mercury-containing devices (switches) were being picked up by Safety Kleen (Kaukana, Wisconsin) for recycling. Used oil is generated and is being picked up by Rock Oil (Stratford, Wisconsin) for recycling. Scrap metal is generated and is being picked up to be recycled by Express Recycling (Wisconsin Rapids, Wisconsin), and is recycled at Marshfield Scrap (Marshfield, Wisconsin). The facility's generated clean wood/pallets is picked up for disposal by Advanced Disposal and disposed of at the Cranberry Creek Landfill (Wisconsin Rapids, Wisconsin).

Site Tour

A physical walk-through of the facility was conducted at approximately 11:15 a.m. We started at the Control Room. There was no waste in this area at the time of the inspection.

At the Operators Lab, there was no waste in this area at the time of the inspection.

Next, I inspected the Maintenance Shop. There was one parts washer in the area.

At the Welding Booth, there was one sand blasting unit. The sand blast waste is non-hazardous and is disposed of at the Cranberry Creek Landfill as stated by Ms. Barteck.

Next, I inspected the Paint Room. There was a drum that contained spill containment oil dry and absorbent supplies as stated by Ms. Barteck. There were two 5-gallon containers that contained waste pending characterization as stated by Ms. Barteck. There were several drums that contained product resins, product oils, product paints, and product lubricants as stated by Ms. Barteck and Mr. Cummins. There was one SAA that consisted of one 30-gallon container. The container was labeled as "Hazardous Waste" and "D001, D035, F003, F005", and was closed. A picture was taken.

Outside, adjacent to the Effluent Shack, I observed one used oil tank. The tank was labeled as "Used Oil."

At the area North of the Ion Exchange Building, I observed monitoring well V-18R. The well head was locked and in good condition. A picture was taken.

I observed the potassium hydroxide and sodium hydroxide product storage tanks (both approximately 650,000 gallons each).

I observed the Load Shed where rail cars are loaded with product from the facility.

Next, I inspected the Hydro Building Vehicle Maintenance Area. There was one 55-gallon drum, situated on a spill containment pallet, which was labeled as "Used Oil." There was one 55-gallon drum, situated on a spill containment pallet, which was labeled as "Used Antifreeze."

I observed the Evap Building, HCl Plant 1, and HCl Plant 2 from the exteriors as no waste is generated in those buildings as stated by Mr. Cummins.

On the way to inspect the Tank Farm, I observed product chlorine storage units as stated by Mr. Cummins.

At the Tank Farm, the brine process in these tanks is either going to or coming from the Cell Room as stated by Mr. Cummins.

Next, I inspected the Salt Pad Waste Storage Area. There were fifteen 55-gallon drums, situated on pallets, which were labeled as "Non-Hazardous Waste" and "WWTP Sludge", and were closed. Ms. Barteck stated that every waste water treatment plant (WWTP) sludge drum that is generated is sampled in ERCO's internal state certified lab. Ms. Barteck stated that ERCO has sampling data on this waste stream for the last five years. There was one 55-gallon drum, situated on a pallet, which contained product sodium hypochlorite as stated by Ms. Barteck. There was one 55-gallon drum, situated on a pallet, which contained product electrical insulating oil as stated by Ms. Barteck. There was one 55-gallon drum, situated on a pallet, which was labeled as "Hazardous Waste", "HCl Sump Clean Out Solids", and "D002, Low pH", was dated 5/20/16, and was closed. There was one 55-gallon drum, situated on a pallet, which was labeled as "Hazardous Waste", was dated 5/25/16, and was closed. Aisle space was sufficient. There was a fire extinguisher, spill containment kit, eye wash and emergency shower station, and two-way radio usage of any employee in the area.

At the South Side of the Salt Pad Waste Storage Area, there was one 12 cubic-yard roll-off container that contained sodium chloride saturator insoluble/brine muds. The roll-off was labeled as "Non-Hazardous Waste."

Next, I inspected the Cell Room SAMCO Area. There was one SAA that consisted of one 55-gallon drum. The container was labeled as "Hazardous Waste" and "Cell Room Intercept Filters & Miscellaneous Cell Room Debris", and was closed. I observed the membrane cell that was comprised of 5 cells as stated by Mr. Cummins. Cells 1 and 5 were potassium hydroxide cells, and cells 2, 3, and 4 were sodium hydroxide cells as stated by Mr. Cummins.

At the Tech Lab, where low-level mercury samples are conducted as stated by Ms. Barteck, there was one SAA that consisted of one 5-gallon container. The container was labeled as "Hazardous Waste", and was closed.

Next, I inspected the Warehouse 90-Day and Universal Waste Storage Area. There was one 5-gallon container that was labeled as "Hazardous Waste" and "PCB Ballast", was dated 6/19/16, and was closed. There was one 55-gallon drum that was labeled as "Used Bulbs", was dated 6/7/16, and was closed. There was one 20-gallon container that was labeled as "Waste Lamps", was dated 11/10/15, and was closed. There was one box that contained spent four foot lamps as stated by Ms. Barteck. The box was labeled as "Waste Lamps", was dated 5/5/16, and was closed. There was one SAA that consisted of one 55-gallon drum. The drum was labeled as

"Broken Bulbs", and was closed. There were two 5-gallon containers that contained spent lead acid batteries as stated by Ms. Barteck. Both containers were labeled as "Waste Batteries", were dated 6/21/16, and were closed. There was one 5-gallon container that contained spent alkaline batteries as stated by Ms. Barteck. The container was labeled as "Waste Batteries", was dated 6/21/16, and was closed. There was one 5-gallon container that contained spent lithium ion batteries as stated by Ms. Barteck. The container was labeled as "Lithium Ion Batteries Only", was dated 4/4/16, and was closed. A picture was taken. Then Ms. Barteck added the labeling "Used - Universal Waste" to the container. A picture was taken. Aisle space was sufficient. There was a fire extinguisher, spill containment kit, eye wash and emergency shower station, and two-way radio usage of any employee in the area.

Record Review

The review of manifests was conducted. Manifests are kept on-site for at least 3 years. The most recent manifests show that all hazardous waste is sent to the following TSDFs: Veolia ES Technical Solutions (WID003967148), Tradebe Treatment & Recycling, LLC (IND000646943), and WM – Mercury Waste, Inc., (WIR000000356). The following transporters were also used: Nexeo Solutions (OHR000162800) and Pioneer Tank Lines, Inc., (MND044176113). All LDR notices were available for review on each manifest for each waste stream. Mr. Cummins or Ms. Jensen typically signs the manifests.

The documented weekly hazardous waste inspection logs were reviewed. Emergency equipment inspections were also occurring.

Waste determinations were documented through analytical testing, waste profiles or determined by generator knowledge (MSDS). I reviewed the analytical report for the TCLP procedure (4/23/15) conducted by Siemens Energy Laboratory (Rothschild, Wisconsin) (WDNR certified # 737053130) for the sand blast waste stream. I reviewed the analytical report for the TCLP procedure (6/8/16) conducted by Siemens Energy Laboratory (Rothschild, Wisconsin) (WDNR certified # 737053130) for the WWTP sludge waste stream. I reviewed the analytical report for the TCLP procedure (9/19/14) conducted by Siemens Energy Laboratory (Rothschild, Wisconsin) (WDNR certified # 737053130) for the sodium chloride brine muds waste stream. ERCO also utilizes its internal laboratory (WDNR certified # 772010470) for waste characterizations.

There was a contingency plan in place for the facility. The plan was titled "Crisis Management Plan." The plan was last revised on September 10, 2014. The reason for the revision to the plan was to update an emergency rescue procedure change as stated by Mr. Bergeron. The emergency coordinators were listed in the plan for the facility. Copies of the contingency plan have been sent to all required local emergency authorities as stated by the plan and Mr. Cummins. The plan did not include the following: location descriptions for the decontamination equipment (eye wash stations and safety showers) and the home addresses for the designated emergency coordinators. During the review of the plan, Mr. Bergeron and Mr. Cummins updated the plan with the locations for the decontamination equipment.

I observed ERCO's WPDES permit (# WI-0003565-08-0), which was effective on July 1, 2014, and expires on June 30, 2019.

I observed ERCO's annual groundwater monitoring report (dated April 8, 2016 for year 2015) and a semi-annual site progress report (dated July 14, 2016).

The last three submitted annual hazardous waste reports were retained on-site.

There was a RCRA hazardous waste management training program in place at the facility. There were facility annual RCRA training sign-in sheets provided that documented that the annual RCRA trainings were conducted and received. The RCRA hazardous waste training certificates were reviewed for Mr. Cummins (provided by Wisconsin Safety Council dated 10/1/14) and Ms. Barteck (provided by Nexeo Solutions dated 9/16/15). There was no documentation of training record requirements provided that included the following: job descriptions for the positions related to hazardous waste management.

Closing Conference

I summarized the RCRA requirements for the following: RCRA training records (documented job descriptions), universal waste management (labeling), and the contingency plan identified during the inspection. The inspection concluded at approximately 3:10 p.m.

ERCO made no claim of confidential business information related to any pictures taken or documents received by U.S. EPA during the inspection.

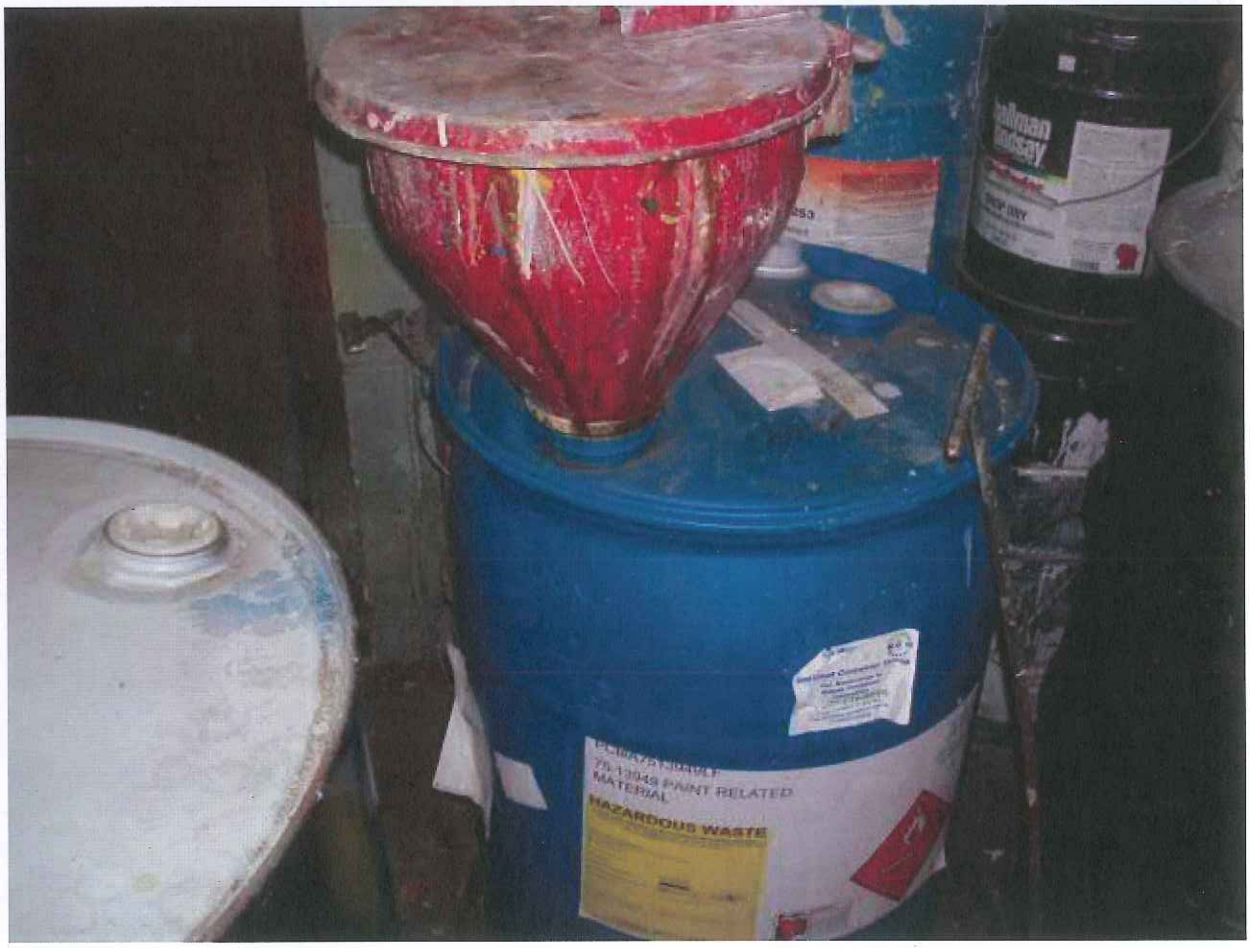
Documents received during this inspection are as follows:

- copy of facility layout including monitoring well locations dated March 2015
- copy of general facility site plan/layout – last revision dated August 13, 2014

Documents given to ERCO during this inspection are as follows:

- U.S. EPA Small Business Resources handout (compliance assistance)
- Region 5 and State Pollution Prevention contact handout
- SHWEC Pollution Prevention handout

A photo log is attached consisting of four (4) photos taken by U.S. EPA during the inspection.



1. A view, at the Paint Room, of one satellite accumulation area (SAA) that consisted of one 30-gallon container. The container was labeled as "Hazardous Waste" and "D001, D035, F003, F005", and was closed.

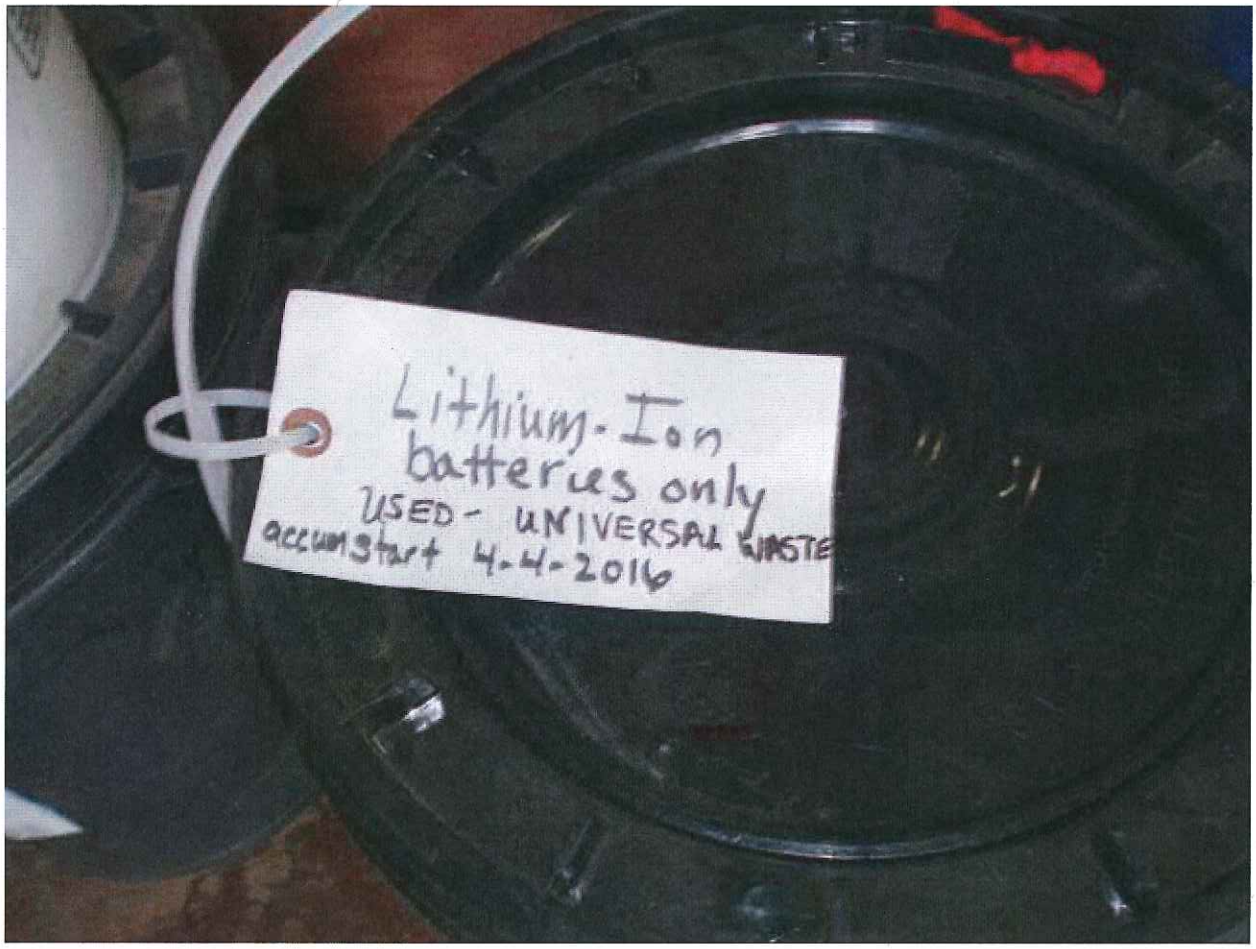
ERCO Worldwide (USA), Incorporated – Port Edwards Plant, Nekoosa, WI
Bryan Gangwisch, U.S. EPA 7/14/16

2. A view, at the area North of the Ion Exchange Building, of monitoring well V-18R.

ERCO Worldwide (USA), Incorporated – Port Edwards Plant, Nekoosa, WI
Bryan Gangwisch, U.S. EPA 7/14/16

3. A view, at the Warehouse 90-Day and Universal Waste Storage Area, of one 5-gallon container that contained spent lithium ion batteries as stated by Ms. Barteck. The container was labeled as "Lithium Ion Batteries Only", was dated 4/4/16, and was closed.

ERCO Worldwide (USA), Incorporated – Port Edwards Plant, Nekoosa, WI
Bryan Gangwisch, U.S. EPA 7/14/16



4. Another view of the same container (as in photo # 3) after Ms. Barteck added the labeling "Used - Universal Waste" to the container.

ERCO Worldwide (USA), Incorporated – Port Edwards Plant, Nekoosa, WI
Bryan Gangwisch, U.S. EPA 7/14/16

7/14/16 ERCO Worldwide (USA), Inc. WID046536231

LARGE QUANTITY GENERATOR INSPECTION

Revision: 08/04/2015
WASTE & MATERIALS MANAGEMENT PROGRAM

This Inspection Form, used for the inspection of facilities that generate over 1000 kg (2205 lbs) of non acute hazardous waste in a calendar month or over 1 kg of acute hazardous waste in a calendar month, evaluates compliance with Wisconsin's Hazardous Waste Management Rules (chapter NR 660 - 679, Wis. Admin. Code).

Section 1: Waste Information

A. Hazardous waste determination has been made on each solid waste generated.	Y	662.011
B. Waste determination was made correctly, considering the listed waste definitions and the characteristics of the waste, in light of the materials or processes used.	Y	662.011(3)
C. Waste samples are analyzed by laboratories certified or registered under NR 149. Provide lab names and certification numbers. Siemens Energy # 737053130 ERCO lab # 772010470	Y	662.011(3)(a)1
D. Generator keeps records of all waste determinations on-site for at least three years from the date the waste was last sent to a storage, treatment or disposal facility.	Y	662.040(3)
E. Generator submitted a notification form and obtained an EPA ID#. Note: A subsequent notification should be submitted when there is an ownership or name change.	Y	662.012

Section 2: Manifest, Pre-Transport Requirements and Off-Site Shipments

A. Generator initiated a manifest with all off-site shipments of hazardous waste.	Y	662.020(1)
B. The manifest is used according to the instructions in the appendix to 40 CFR part 262.	Y	662.020(1)
C. The facility designated on the manifest is permitted or licensed to accept the waste.	Y	662.020(2)
D. For out-of-state shipments, a copy of the manifest is sent to the department within 30 days of receiving the signed copy from the designated facility.	Y	662.023(3)
E. Manifest continuation form, EPA form 8700-22A, is prepared according to the instructions in the appendix of 40 CFR part 262.	Y	662.020(1)
F. If the generator received a shipment back as a rejected load, the returned waste was accumulated in compliance with the container or tank standards for less than 90 days.	N/A	662.034(13)
G. Upon receipt of the rejected shipment, the generator signed EITHER of the following: 1. Manifest Item 18c if the transporter returned the shipment using the original manifest. 2. Manifest Item 20 if the transporter returned the shipment using a new manifest.	N/A	662.034(13)
H. A copy of the manifest signed by the generator is retained until the signed copy from the designated facility is received.	Y	662.040(1)
I. Copy of each manifest is kept for at least three years from the date of shipment.	Y	662.040(1)
J. Hazardous waste is packaged according to applicable DOT requirements before transport.	Y	662.030
K. Hazardous waste is labeled according to applicable DOT requirements before transport.	Y	662.031

Section 2: Manifest, Pre-Transport Requirements and Off-Site Shipments

L. Hazardous waste is marked according to applicable DOT requirements before transport.	Y	662.032(1)
M. Containers of 119 gallons and less are marked with the "Hazardous Waste-Federal law prohibit improper disposal" label before transport.	Y	662.032(2)
N. Placards are offered to the initial transporter.	Y	662.033

Section 3: Land Disposal Restrictions

A. Generator determined if each waste is prohibited from land disposal by lab analysis or generator knowledge.	Y	668.07(1)
B. A copy of the LDR notification and certification for solid wastes even when the hazardous characteristic is removed prior to disposal, or when the waste is excluded from the definition of hazardous or solid waste under ss. NR 661.02 to 661.06, or exempted from ch. 291, Stats., and chs. NR 660 to 673, subsequent to the point of generation.	N/A	668.07(1)(h)
C. Generator complies with the prohibition against dilution of wastes.	Y	668.03
D. A one-time written notice was sent to each treatment, storage or disposal facility with the initial waste shipment.	Y	668.07(1)
E. A new notification is sent to the TSD and maintained in the generator file when the waste or receiving facility changes.	Y	668.07(1)
F. If the waste MEETS treatment standards, the LDR notice certifies wastes may be land disposed without further treatment.	N/A	668.07(1)
G. If the waste EXCEEDS treatment standards, the LDR notice gives notification of appropriate treatment and applicable prohibitions.	Y	668.07(1)
H. A copy of the LDR notifications and certifications are retained for at least 3 years from the date the waste was last sent off-site.	Y	668.07(1)(h)
I. Underlying hazardous constituents have been identified for characteristic wastes.	Y	668.09(1)
J. Generator identifies EITHER of the following when the waste is both a listed and characterisitic waste: 1. The treatment standards for the listed waste code, in lieu of the treatment standard for the characteristic waste codes. 2. The treatment standards for all applicable listed and characteristic waste codes.	Y	668.09(2)
K. If waste is treated in containers or tanks, the generator meets BOTH of the following (NR 668.07(1)(e): 1. Developed a written waste analysis plan describing the procedures used to meet applicable LDR treatment standards. 2. Complies with the certification requirements in NR 668.07(1)(c).	N/A	662.034(1)(d)

Section 4: Annual Reports and Exception Reporting

A. Annual reports covering generator activities during the calendar year have been submitted to the Department by March 1 of the following year.	Y	662.041
B. Transporter or TSD is contacted if signed manifest is not received in 35 days.	N/A	662.042(1)
C. Exception report is submitted to the Department if a signed manifest is not received within 45 days.	N/A	662.042(2)
D. Copy of each annual report and exception report is kept for at least 3 years from the date of the report.	Y	662.040(2)

Section 5: Preparedness and Prevention

A. Generator has ALL of the following, unless the equipment is not necessary for the types of wastes handled (NR 665.0032): 1. Device to summon emergency assistance (e.g., telephone, 2 way radio). 2. Internal communications and alarm systems. 3. Portable fire extinguishers. 4. Fire control equipment, including special extinguishing equipment. 5. Spill control equipment. 6. Decontamination equipment (e.g., eyewash, shower). 7. Water at adequate volume and pressure to supply water spray systems.	Y	662.034(1)(d)
B. All of the above emergency equipment is tested and maintained to assure its proper operation in an emergency (NR 665.0033).	Y	662.034(1)(d)
C. There is immediate access to internal or external alarms or an emergency communication device in hazardous waste handling areas (NR 665.0034).	Y	662.034(1)(d)
D. Generator has made ALL of the following arrangements with emergency organizations (NR 665.0037): 1. Primary and support roles have been defined if multiple police and fire departments could respond to an emergency. 2. Police, fire and emergency response teams are familiar with the site layout, hazards of the waste handled, places where personnel work, entrances and roads in the site and possible evacuation routes. 3. Agreements are made with emergency response contractors and equipment suppliers. 4. Local hospitals are familiar with the properties of wastes handled and the types of injuries or illnesses that could result from an emergency.	Y	662.034(1)(d)
E. Aisle space provided throughout the facility to allow for the unobstructed movement of personnel and all emergency equipment (NR 665.0035).	Y	662.034(1)(d)

Section 6: Contingency Plan and Emergency Procedures

A. Generator has a written contingency plan, amended SPCC plan or other emergency plan that will be implemented immediately in the event of a fire, explosion or hazardous waste discharge (NR 665.0051). If there is no written plan go to question 7.A.	Y	662.034(1)(d)
B. Generator has amended a SPCC plan or other emergency plan so it sufficiently incorporates hazardous waste management provisions (NR 665.0052(2)).	Y	662.034(1)(d)

Section 6: Contingency Plan and Emergency Procedures

C. Copies of the contingency plan and all revisions have been made available to police, fire, hospital and emergency response teams. (NR 665.0053(2)).	Y	662.034(1)(d)
D. Contingency plan was amended due to ANY of the following (NR 665.0054): 1. Contingency plan failed in an emergency. 2. Change in site design, construction, O&M, or other circumstances which affect emergency response 3. Emergency coordinators changed. 4. Emergency equipment changed.	Y	662.034(1)(d)
E. Contingency plan identifies an emergency coordinator who meets ALL of the following (NR 665.0055): 1. Available or on call to coordinate emergency response measures. 2. Familiar with all aspects of site activities and the contingency plan. 3. Has authority to commit the resources needed to carry out the contingency plan.	Y	662.034(1)(d)
F. Contingency plan includes ALL of the following (NR 665.0052): 1. Designation of the primary emergency coordinator, with alternates listed in the order of assuming responsibility. 2. Name, address and phone number, office and home, for each emergency coordinator. 3. Description of the arrangements agreed to by the police, fire, hospitals and emergency response teams to coordinate emergency services. 4. Evacuation plan for personnel including signal(s) to be used in the event of evacuation and alternate routes. 5. Actions facility personnel will take in response to a fire, explosion, or hazardous waste discharge. 6. List of emergency equipment at the site, including location, description and capabilities of each item.	N	662.034(1)(d)
G. Contingency plan requires the emergency coordinator to do ALL of the following in the event of a fire, explosion, or discharge of hazardous wastes (NR 665.0056): 1. Activate internal alarms or communication systems. 2. Notify appropriate authorities, if their help is needed. 3. Identify the character, source, amount, and extent of discharged hazardous materials. 4. Assess hazards to human health and the environment. 5. If the incident threatens human health or the environment outside the facility, notify local authorities that evacuation may be necessary and notify the national response center (800-424-8802) and the division of emergency government (800-943-0003). 6. Take all reasonable measures necessary to ensure fires, explosions and discharges do not occur, reoccur, or spread. 7. Monitor for leaks, pressure buildup, gas generation or ruptures in valves, pipes, or other equipment if the site stops operation. 8. Provide for treating, storing, or disposing of recovered waste, contaminated soil, surface water, or other material. 9. Ensure wastes that are incompatible with the released material are not treated, stored or disposed until cleanup is completed. 10. Ensure that emergency equipment is clean and fit for use prior to resuming operations. 11. Notify the department and appropriate state and local authorities before resuming operations. 12. Submit an incident report to the department within 15 days.	Y	662.034(1)(d)

Section 7: Personnel Training Requirements

A. Generator has a program of classroom instruction or on-the-job training for personnel in hazardous waste management (NR 665.0016(1)(a)). If there is no training program go to question 8.A.	Y	662.034(1)(d)
B. Program is directed by a person trained in hazardous waste management procedures (NR 665.0016(1)(b)).	Y	662.034(1)(d)

Section 7: Personnel Training Requirements

C. Program teaches facility personnel hazardous waste management procedures relevant to the positions in which they are employed (NR 665.0016(1)(b)).	Y	662.034(1)(d)
D. Training program ensures personnel are able to respond effectively to emergencies by familiarizing them with the following applicable items (NR 665.0016(1)(c)): 1. Contingency plan implementation. 2. Procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment. 3. Key parameters for automatic waste feed cut-off systems. 4. Communications and alarm systems. 5. Response to fires or explosions. 6. Response to groundwater contamination incidents. 7. Shutdown of operations.	Y	662.034(1)(d)
E. New employees are trained within 6 months of their assignment (NR 665.0016(2)).	Y	662.034(1)(d)
F. Employees work in supervised positions until they have completed the training (NR 665.0016(2)).	Y	662.034(1)(d)
G. Personnel take part in an annual review of the training (NR 665.0016(3)).	Y	662.034(1)(d)
H. Generator keeps ALL of the following training documents (NR 665.0016(4)): 1. Job title and the employee name for each position related to hazardous waste management. 2. Job description for each of the above job titles. 3. Description of the amount and type of introductory and continuing training that will be given to each employee. 4. Records that required training has been given to each employee.	N	662.034(1)(d)
I. Training records are maintained until closure for current personnel and at least 3 years from the date the employee last worked at the facility (NR 665.0016(5)).	Y	662.034(1)(d)

Section 8: 90-Day Container Accumulation

A. Waste is accumulated in containers. If NO, go to Section 9.	Y	
B. Accumulation start date is clearly marked and visible for inspection on each container.	Y	662.034(1)(b)
C. All containers are clearly marked with the words "Hazardous Waste".	Y	662.034(1)(c)
D. If container is leaking or in poor condition, the contents are transferred to another container in good condition (NR 665.0171).	N/A	662.034(1)(a)1
E. Containers are made of or lined with materials that are compatible with the waste (NR 665.0172).	Y	662.034(1)(a)1
F. Containers are kept closed, except when it is necessary to add or remove waste (NR 665.0173(1)).	Y	662.034(1)(a)1
G. Containers are opened, handled or stored to prevent leaks or ruptures (NR 665.0173(2)).	Y	662.034(1)(a)1

Section 8: 90-Day Container Accumulation

H. Container storage areas are inspected weekly for leaks and deterioration (NR 665.0174).	Y	662.034(1)(a)1
I. Containers of ignitable or reactive waste are located at least 50 feet from the property line (NR 665.0176).	Y	662.034(1)(a)1
J. Containers of incompatible wastes are separated or protected from each other by a physical barrier (dike, berm, wall or other device) (NR 665.0177(3)).	N/A	662.034(1)(a)1
K. Incompatible wastes are stored in separate containers unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(1)).	N/A	662.034(1)(a)1
L. Containers that previously held waste are properly washed before adding incompatible waste, unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(2)).	N/A	662.034(1)(a)1

Section 9: Subchapter BB Standards for Equipment Leaks

A. Generator operates any of the following equipment containing or contacting hazardous wastes with organic concentration >= 10% by weight. If NO, go to Section 10 (NR 662.034(1)(a), NR 665.1050(2). 1. Pumps in light liquid service. 2. Compressors. 3. Pressure relief devices in gas or vapor service. 4. Sampling connection systems. 5. Open-ended valves or lines. 6. Valves in gas or vapor service or in light liquid service. 7. Pumps or valves in heavy liquid service 8. Pressure relief devices in light liquid or heavy liquid service. 9. Flanges or other connectors.	N/A	
B. Equipment listed in Question 9.A. is excluded from subch. BB requirements because it is in vacuum service and individually listed in the facility operating record by an identification number (NR 665.1050(4), NR 665.1064(7)(e)).		662.034(1)(a)
C. Equipment listed in Question 9.A. is excluded from subch. BB requirements because it operates < 300 hours per calendar year and is identified, either by list or location (area or group), in the facility operating record. (NR 665.1050(5), NR 665.1064(7)(f)).		662.034(1)(a)
D. If the facility determines compliance with subch. BB by documenting compliance with Clean Air Act requirements, the documentation is readily available as part of the operating record (NR 665.1064(13)).		662.034(1)(a)
E. ALL of the following information used to determine the applicability of exclusions in Questions 9.B. - 9.D. is maintained at the facility (NR 665.1064(11)): 1. Analysis determining the design capacity of the hazardous waste management unit. 2. Statement listing the hazardous waste influent to and effluent from each hazardous waste management unit subject to subch. BB and an analysis determining whether these hazardous wastes are heavy liquids. 3. Up-to-date analysis and the supporting information used to determine whether or not equipment is subject to subch. BB.		662.034(1)(a)
F. When knowledge of the nature of the hazardous waste stream or the process by which it was produced is used to determine the applicability of the exclusions, supporting documentation such as the following are maintained at the facility (NR 665.1064(11)): 1. Information that the production process does not use organic compounds. 2. The process is identical to a process at another facility where the total organic content was measured at <10%. 3. The process has not changed to affect the total organic concentration of the waste.		662.034(1)(a)

Section 9: Subchapter BB Standards for Equipment Leaks

G. The facility keeps records of new determinations performed when there are any changes that could result in an increase in the total organic content of the waste in contact with equipment that is not subject to subch. BB requirements (NR 665.1064(11)).	N/A	662.034(1)(a)
H. All equipment stated in Question 9.A. is excluded from additional subch. BB requirements. If NO, complete the subch. BB inspection form.	N/A	

Section 10: Subchapter CC Level 1 Container Standards

There were no Subpart CC level 1 containers in storage at time of inspection only in SAA

A. The facility manages hazardous waste in containers with EITHER of the following design capacities. If NO, go to Question 11.A. (NR 665.1087(2)(a), NR 662.034(1)(a)1). 1. Between 26 and 119 gallons. 2. Greater than 119 gallons and not in light material service.	Y	
B. Containers are exempt from CC regulation because of ALL of the following (NR 662.034(1)(a)1, NR 665.1083(3)(a), NR 665.1084(1)(a)1, NR 665.1083(3)(a), NR 665.1084(1)(a)2., NR 665.1084(1)(b)): 1. The average VO concentration at the point of origination is <500 ppmw for all hazardous waste entering the container. 2. The initial determination of the average VO concentration for the waste stream was made before the material was placed in the container. 3. The initial determination is reviewed and updated at least once every 12 months. 4. A new waste determination is performed whenever changes to the source generating the waste stream likely causes the average VO concentration to increase to >= 500 ppmw. 5. The average VO concentration is determined by direct measurement or by knowledge. Note: See NR 665.1084(1)(c) for direct measurement procedures and NR 665.1084(1)(d) for using knowledge.	N	
C. For each waste determination, the date, time, and location of each waste sample collected are maintained in the facility records (NR 665.1090(6)(a)).	N/A	662.034(1)(a)1
D. Containers are excluded from subch. CC because they are used to store or treat hazardous waste from organic peroxide manufacturing processes (NR 662.034(1)(a)1, NR 665.1080(4)). Note: Certain records are to be maintained. Refer to 665.1090(9) for more information.	N	
E. Containers are excluded from subch. CC because they are used solely to store or treat EITHER of the following (NR 662.034(1)(a)1, NR 665.1080(2), NR 665.1090(10)): 1. On-site remediation wastes generated through NR 700 or RCRA corrective action activities. 2. Radioactive mixed wastes in accordance with NRC requirements	N	
F. Containers are excluded from subch. CC because BOTH of the following are met (NR 665.1080(2), NR 665.1090.(10)): 1. They are equipped with air emission controls operated in accordance with the Clean Air Act requirements. 2. Facility records include certification of such by the owner or operator and the specific air program compliance requirements for the containers	N	
G. All containers are excluded from subch. CC Level 1 standards. If YES, go to Section 11.	N	
H. Any of the following controls are used on all Level 1 containers (NR 665.1087(3)(a)): 1. Container meets applicable US DOT packaging requirements. 2. A cover and closure devices form a continuous barrier over the container openings such that when they are secured, there are no visible holes, gaps or other open spaces into the container. 3. An organic-vapor suppressing barrier is placed on or over the hazardous waste in an open-top container so that the hazardous waste is not exposed to the atmosphere. Note: Level 1 standards do not apply to satellite accumulation or RCRA empty containers.	N/A	662.034(1)(a)1

Section 10: Subchapter CC Level 1 Container Standards

I. If Level 1 containers do not meet applicable US DOT packaging requirements, they are equipped with covers and closure devices composed of suitable materials that minimize exposure of hazardous waste to the atmosphere and maintain integrity of the covers and closure devices (NR 665.1087(3)(b)).	N/A	662.034(1)(a)1
J. If a Level 1 container is filled to the final level in one continuous operation, the closure device is promptly secured in the closed position when the filling operation is concluded (NR 665.1087(3)(c)1.a).	N/A	662.034(1)(a)1
K. If a Level 1 container is batch filled, the closure device is promptly secured in a closed position when the container is filled to the intended final level OR the batch loading is completed and any of the following first occurs (NR 665.1087(3)(c)1.b): 1. No additional material will be added within 15 minutes. 2. The person performing the loading operation leaves the immediate vicinity of the container. 3. The process generating the waste shuts down.	N/A	662.034(1)(a)1
L. If a Level 1 container is opened to remove hazardous waste, the closure device is secured in the closed position upon completion of a batch removal AND when either of the following first occurs (NR 665.1087(3)(c)2b): 1. No additional materials will be removed within 15 minutes. 2. The person removing the waste leaves the immediate vicinity of the container.	N/A	662.034(1)(a)1
M. If access to the inside of a Level 1 container is needed to perform routine activities other than the transfer of hazardous waste (e.g., sampling), the closure device is secured in the closed position promptly after completing the activity (NR 665.1087(3)(c)3).	N/A	662.034(1)(a)1
N. If a Level 1 container is equipped with a pressure relief device that vents to the atmosphere, ALL of the following conditions are met (NR 665.1087(3)(c)4): 1. The device is designed to operate with no detectable organic emissions (< 500 ppmv) when in the closed position. 2. The device is closed when the internal pressure is within the specified operating range. 3. The device opens and vents to the atmosphere only for the purpose of maintaining internal pressure according to the design specifications.	N/A	662.034(1)(a)1
O. Safety valves are only opened to avoid an unsafe condition (NR 665.1087(3)(c)5).	N/A	662.034(1)(a)1
P. When a defect is detected, initial repair efforts are made within 24 hours of detection and completed within 5 calendar days (NR 665.1087(3)(d)3).	N/A	662.034(1)(a)1
Q. If repairs cannot be completed in 5 days of detecting the defect, the waste is removed from the container which is not used until it is repaired (NR 665.1087(3)(d)3).	N/A	662.034(1)(a)1

Section 11: Subchapter CC Level 2 Container Standards

A. The facility manages hazardous waste containers with a design capacity >119 gallons that are in light material service. If NO, go to Section 12.	N/A	
B. Any of the following controls are used on Level 2 containers: (NR 665.1087(4)(a)) 1. Container meets applicable US DOT packaging requirements. 2. Each potential leak interface where organic vapor leakage could occur on the container, cover and closure device has been checked to determine that no detectable organic emissions (< 500 ppmv) are occurring. 3. The facility has demonstrated within the last 12 months that the containers are vapor-tight using Method 27 in appendix A of 40 CFR part 60.	N/A	662.034(1)(a)2

Section 11: Subchapter CC Level 2 Container Standards

C. If the potential leak interface on the containers were checked, BOTH of the following were met: (NR 665.1087(4)(a)) 1. Checks were made on the interface of the cover rim and the container wall; the periphery of any opening on the container or container cover and its associated closure device; and, the sealing seat interface on a spring-loaded, pressure-relief valve. 2. The test was performed when the container was filled with a material having a VO concentration representative of the hazardous waste expected to be stored in the container.	N/A	662.034(1)(a)2
D. The facility maintains a copy of the procedure used to determine that containers >119 gallons in size that do not meet DOT requirements are not managing hazardous waste in light material service. (NR 665.1087(3)(e))		662.034(1)(a)2
E. Level 2 controls are used when transferring waste in or out of the container that minimize exposure to the atmosphere (submerged-fill pipe, vapor-recovery system, etc.) to the extent practical, considering the physical properties of the hazardous waste and good engineering and safety practices. (NR 665.1087(4)(b))		662.034(1)(a)2
F. If the container is filled to the final level in one continuous operation, the closure devices are promptly secured in the closed position when the filling operation is concluded. (NR 665.1087(4)(c)1.a.)		662.034(1)(a)2
G. If the container is batch filled, the closure devices are promptly secured in a closed position upon filling the container to the intended final level, or when the batch loading is completed and ANY of the following first occurs: (NR 665.1087(4)(c)1.b.) 1. No additional material will be added within 15 minutes. 2. The person performing the loading operation leaves the immediate vicinity of the container. 3. The process generating the waste shuts down.		662.034(1)(a)2
H. If containers are opened to remove hazardous waste, closure devices are secured in the closed position upon completion of a batch removal and either of the following first occurs: (NR 665.1087(4)(c)2.b.) 1. No additional materials will be removed within 15 minutes. 2. The person removing the waste leaves the immediate vicinity of the container.		662.034(1)(a)2
I. If access to the inside of the container is needed to perform routine activities other than the transfer of hazardous waste (e.g., sampling), the closure device is secured in the closed position promptly after completing the activity. (NR 665.1087(4)(c)3.)		662.034(1)(a)2
J. If the container is equipped with a pressure relief device that vents to the atmosphere, the device meets ALL of the following conditions: (NR 665.1087(4)(c)4.) 1. Designed to operate with no detectable organic emissions when in the closed position. 2. Closed when the internal pressure is within the specified operating range. 3. Opens and vents to the atmosphere only for the purpose of maintaining internal pressure according to the design specifications.		662.034(1)(a)2
K. Safety valves are only opened to avoid an unsafe condition. (NR 665.1087(4)(c)5.)		662.034(1)(a)2
L. When a defect is detected, initial repair efforts are made within 24 hours of detection. (NR 665.1087(4)(d)3.)		662.034(1)(a)2
M. Repairs are completed within 5 days, or the waste is removed from the container which is not used until the defect is repaired. (NR 665.1087(4)(d)3.)		662.034(1)(a)2

Section 12: Subchapter CC Level 3 Container Standards

A. The facility manages hazardous waste in containers having a design capacity >26 gallons during a waste stabilization process when hazardous waste is exposed to the atmosphere. If NO, go to Section 13.	N/A	
B. The container is vented directly through a closed-vent system to a control device, or the container is vented inside an enclosure which is exhausted through a closed-vent system to a control device. (NR 665.1087(5)(a))	N/A	662.034(1)(a)2

Section 12: Subchapter CC Level 3 Container Standards

C. If the container is vented inside an enclosure, the enclosure is operated according to the criteria for permanent total enclosures found in Method 204 in appendix M of 40 CFR part 51. (NR 665.1087(5)(b)1.)	N/A	662.034(1)(a)2
D. Records for the most recent set of calculations and measurements verifying the enclosure meets the criteria for a permanent total enclosure in Method 204 in appendix M of 40 CFR part 51 are maintained at the facility. (NR 665.1090(4)(a))		662.034(1)(a)2
E. Level 3 controls are used when wastes are transferred in or out of the container that minimize exposure to the atmosphere (e.g., submerged-fill pipe, vapor-recovery system, etc.) to the extent practical, considering the physical properties of the hazardous waste and good engineering and safety practices. (NR 665.1087(5)(f))		662.034(1)(a)2

Section 13: Satellite Accumulation

A. Waste is accumulated in satellite accumulation areas. If NO, go to Section 14.	Y	
B. Generator accumulates no more than 55 gallons of hazardous waste or 1 quart of acute hazardous waste in each satellite area.	Y	662.034(3)(a)
C. Satellite containers are under the control of the operator of the process generating the waste.	Y	662.034(3)(a)
D. Containers are made of or lined with materials that are compatible with the waste (NR 665.0172).	Y	662.034(3)(a)1
E. If a container is leaking or in poor condition, the contents are transferred to another container in good condition (NR 665.0171).	N/A	662.034(3)(a)1
F. Containers are kept closed except when it is necessary to add or remove waste (NR 665.0173(1)).	Y	662.034(3)(a)1
G. Containers are marked "Hazardous Waste" or with other words that identify the contents.	Y	662.034(3)(a)2
H. Container holding the excess waste is marked with the date the excess amount begins accumulating.	N/A	662.034(3)(b)
I. Generator complies with the 90 day accumulation requirements with respect to the excess amount within 3 days of it being generated.	N/A	662.034(3)(b)

Section 14: Waste Minimization

A. Generator includes waste minimization information in the annual report.	Y	662.041(3)(e)
B. Generator has a program in place to reduce the volume or quantity and toxicity of waste to an economically practicable degree. Note: The inspector should look for evidence justifying the generator's waste minimization certification on the manifest. Also, EPA guidance recommends that the generator have a written waste minimization/pollution prevention plan.	Y	662.027(1)

Section 15: Used Oil

A. Used oil is managed on-site. If NO, go to Section 16	Y	
B. Used oil containing >= 1,000 ppm halogens is managed as listed hazardous waste or the rebuttable presumption requirements have been met.	N/A	679.10(2)(a)2
C. Used oil containers and tanks are in good condition and not leaking.	Y	679.22(2)
D. Used oil containers and tanks are marked "used oil".	Y	679.22(3)(a)
E. Transporter has an EPA ID number, except when generator self-transports or has a tolling agreement.	Y	679.24
F. If oil containing materials are disposed of as a solid waste, the used oil has been properly drained so there is no visible sign of free-flowing oil and a waste determination has been properly made.	N/A	679.10(3)(a)
G. If used oil is burned in an on-site used oil-fired space heater, all of the following are met: 1. Only used oil from the generator or household do-it-yourselfers is burned. 2. The heater is designed with a maximum capacity of 0.5 million BTU per hour or less. 3. The combustion gases are vented to the ambient air.	N/A	679.23
H. If used oil is accepted from others or sent off-site to be burned in a space heater, the used oil meets fuel specifications and the marketer requirements in NR 679 subch. H are met.	N/A	679.11

Section 16: Universal Waste

A. The facility is a small quantity handler of universal waste (never accumulates more than 11,025 lbs). If NO, state in the comments section if the facility is a universal waste nonhandler, large handler or destination facility, and go to Section 17. Note: If the facility is a large handler, complete the large quantity handler of universal waste inspection form.	Y	
B. Universal waste has not been disposed, treated or diluted. Note: Dilution or treatment does not include: sorting, mixing, discharging, regenerating, or disassembling batteries; removing batteries from consumer products or removing electrolytes; removing thermostat ampules; or, responding to a release of universal waste.	Y	673.11
C. Universal waste batteries and thermostats that are broken or show evidence of leakage or spillage are placed in closed, structurally sound containers that are compatible with the waste and not leaking.	N/A	673.13
D. Universal waste lamps and pesticides are placed in closed, structurally sound containers that are compatible with the waste and are not leaking.	Y	673.13
E. All universal wastes are labeled or marked "Waste" or "Used" followed by the specific type of universal waste handled or "Universal Waste".	N	673.14
F. Universal waste is accumulated for less than one year from the date generated or received from another handler.	Y	673.15(1)
G. If universal waste is accumulated beyond one year, the handler can prove that accumulation was necessary to facilitate proper recovery, treatment or disposal.	N/A	673.15(2)

Section 16: Universal Waste

H. Length of accumulation time is demonstrated by any of the following: 1. Each container is marked or labeled with the earliest date the waste is generated or received 2. The individual item of waste is marked or labeled with the date it was generated or received. 3. An inventory system identifying the date the waste was generated or received is maintained. 4. The universal waste is placed in a specific accumulation area identified with the earliest date the waste was generated or received.	Y	673.15(3)
I. Employees are trained on the proper handling and emergency procedures appropriate to the types of waste handled at the facility.	Y	673.16
J. ALL of the following are met when a release occurs: 1. Release is immediately contained. 2. A waste determination is made. 3. Spill residue is disposed of properly as solid or hazardous waste.	N/A	673.17
K. Handler sends the waste to a destination facility, foreign destination or another handler. Indicate the facilities in the comments section. Safety Kleen	Y	673.18(1)
L. For hazardous materials, the handler packages, labels, marks, placards and prepares the proper shipping papers in accordance with DOT requirements in 49 CFR parts 172 to 180.	Y	673.18(3)
M. The following activities have occurred. If YES, complete the Universal Waste Small Quantity Handler inspection form. 1. Universal waste are sorted or disassembled. 2. Recalled pesticides are managed. 3. Universal waste shipments have been rejected. 4. Universal waste shipments have included hazardous or solid waste. 5. Universal waste is self-transported.	N/A	

Section 17: F006 Wastewater Treatment Sludge

A. Generator accumulates F006 sludge for more than 90 days. If NO, go to Section 18.	N/A	
B. The F006 waste is accumulated for no more than 180 days, unless the waste is shipped 200 miles or more.		662.034(7)
C. Pollution prevention practices are in place to reduce the amount of contaminants entering the F006 waste.		662.034(7)(a)
D. The F006 waste is legitimately recycled through metals recovery.		662.034(7)(b)
E. No more than 20,000 kg (44,100 lbs) of F006 waste is accumulated on-site.		662.034(7)(c)
F. Accumulation containers meet subch. I, AA, BB and CC standards in ch. NR 665.		662.034(7)(d)1.a
G. The accumulation start date is clearly marked and visible for inspection on each container.		662.034(7)(d)3
H. Accumulation tanks meet subch. J, AA, BB and CC standards in ch. NR 665, except for NR 665.0197(3) and NR 665.0200.		662.034(7)(d)1.b

Section 17: F006 Wastewater Treatment Sludge

I. Each container and tank of F006 waste is clearly marked with the words "Hazardous Waste".	N/A	662.034(7)(d)4
J. A containment building used for accumulation meets subch. DD standards in ch. NR 665; a P.E. certification stating compliance with the design standards is in the operating record AND written procedures and documentation for emptying the unit within 180 days are on file.		662.034(7)(d)1.c
K. The accumulation of F006 waste is included in the preparedness and prevention procedures, contingency plan and personnel training program.		662.034(7)(d)5
L. If waste is accumulated for up to 270 days, the generator must ship the waste over 200 miles for metals recovery.		662.034(8)

Section 18: Generator Status Evaluation

A. Waste is accumulated for less than 90 days, except as allowed in Sections 13 and 16.	Y	662.034(1)
B. More than 2,205 lbs. of non-acute hazardous waste; 2.2 lbs. of acute hazardous waste; or, 220 lbs. of residue from cleanup of an acute hazardous waste spill is generated in any month (NR 662.190(1), NR 662.220(4)).	Y	
C. Describe other activities that the generator conducts at the facility (accumulation in tanks, recycling, 10-day transfer, transporter, used oil treatment, storage, disposal, universal waste etc.).		
D. If waste was previously accumulated in a tank system, the generator performed EITHER of the following (NR 665.0197(1), NR 665.0197(2)): 1. Closure by removing or decontaminating waste residues, contaminated containment system components, soils, structures and equipment. 2. Initiated long-term care if all contaminated soils cannot be practicably removed or decontaminated.	Y	662.034(1)(a)2